

# ISD Administration of GSRP

## The Early Childhood Contact (ECC)

As part of administering the Great Start Readiness Program (GSRP), the Intermediate School District (ISD) will designate an Early Childhood Contact (ECC). The ECC is the early childhood leader at the ISD, facilitating an ISD-wide plan with a vision to improve child outcomes, to minimize achievement gaps and help all stakeholders to see the “big picture” of how GSRP strategically fits into the local Great Start Collaborative (GSC) early childhood efforts. The ECC uses the written GSRP philosophy statement as a foundation to partner with the GSRP Early Childhood Specialists (ECS) on data-based decisions for continuous quality improvement. For ISDs with larger populations, the ECC may work with a team to fulfill the responsibilities of the position. For ISDs with smaller populations, the ECC may also serve as the ECS. In this instance, care must be taken to ensure that responsibilities of the ECS, as outlined in the [Early Childhood Specialist](#) section of this manual, are not compromised.

The ECC ensures that effective systems are in place to support GSRP. ISD administrative policies and procedures document approaches to overarching aspects of the grant, such as community needs assessment, choosing and supporting subrecipients, notification of funding, community partnerships, recruitment, parent engagement, communication, record-keeping, staff credentialing, and program and fiscal monitoring. Administrative policies and procedures must also address systematic oversight of subrecipient practices.

## Early Childhood Specialist (ECS)

The ECC ensures that there is an ECS assigned to each classroom. At times, ISDs are unable to identify a well-qualified candidate to fill an ECS position after an extensive search. In that case, the ECC should contact the assigned consultant.

- Only a Reliable Assessor/Certified Observer completes the observations, interviews and scoring of the program evaluation tools(s). The Reliable Assessor/Certified Observer participates in the recertification process to maintain status as a Reliable Assessor/Certified Observer. See the [Program Evaluation](#) section of this manual for related information.
- The ECS contract accommodates the intensive support and additional classroom visits, coaching and consultation that staff members with incomplete credentialing require.

In determining ECS classroom assignments and other duties, the ISD is responsible first and foremost for assuring the ECS’s role in coaching and supporting the teaching team. As the ECC designs the system of ECS supports for the ISD and assigns classrooms to individual ECS, the following elements are considered:

- Required ECS functions and the hours needed to complete them.

- Additional functions the ISD assigns to ECS and the hours needed to complete them.
- Expertise and experience of the ECS.
- Experience of the subrecipient and teaching team(s) with operating a preschool program, maintaining a childcare license, and meeting GSRP requirements. For example, the ECC may plan additional classroom visits and/or more intensive support for beginning teachers, teachers new to GSRP or teachers that have less-than-expected program quality.
- Number of assigned subrecipients, sites, and classrooms.
- Geographic location of the assigned classrooms and amount of travel time between sites.
- Relationships between the ECS and teaching teams, especially if ECS are monitoring teaching staff as well as coaching them.

The ISD provides:

- A master calendar for all ECS activities, which aligns with reporting requirements on program evaluation, scheduled professional learning calendars and meetings such as ECS peer group, the local parent advisory meetings, school readiness advisory committee, or superintendent/school board meetings.
- A coaching documentation system and form(s) used for each session. The form must include at a minimum the date, the intention of the session, method of feedback with the lead and associate teachers, observational notes reflecting the session, any expected follow-up on either the part of the ECS or the teaching team, and confirmation that all members of the teaching team and the ECS participated in the session and agree to the content of the form. The ECS must keep a copy of the form and provide one to the teaching team. The ECC should review documentation periodically to see that teaching teams are getting the support needed and that the ECS team members are fulfilling the requirements of the position.
- A position description for every ECS, whether employed or contracted by the ISD or subrecipient, that includes the amount of time to be dedicated to GSRP work for the year. All position descriptions must be clear in the expectations to meet GSRP requirements: classroom observation/program evaluation, feedback, ongoing support, meetings, professional learning, etc. All must include a requirement to attend ISD and/or MDE ECS meetings and professional learning required for the ECS as well as being available to the ISD or MDE as needed as part of the monitoring process. References to meeting the requirements included in the position description must be included in all subrecipient contracts where the subrecipient provides the ECS.

Supporting alignment of GSRP with K-12 and children's transition into kindergarten and protecting hallmarks of early childhood education such as learner-centered, active, participatory learning and authentic partnership with families in their child's development. (See the [Transition section](#) of the Implementation Manual for more information.)

## Branding

A program name-change in fiscal year 2008-2009, from the Michigan School Readiness Program (MSRP) to the Great Start Readiness Program (GSRP), helped to directly align our state prekindergarten program with Project Great Start, our state early childhood initiative to foster school readiness and life success for young children. Grant branding must be evident at the ISD, subrecipient, and classroom, and may be formally addressed within written agreements.

The name and logo identify each program as a strong partner in the systems-building efforts of Great Start, where services to children and families emerge from our Michigan [Early Childhood Standards of Quality for Infants and Toddlers \(ECSQ-IT\)](#) and the [Early Childhood Standards of Quality for Prekindergarten \(ECSQ-PK\)](#). Name-branding assists advocacy efforts, making it evident that children who participate in GSRP have strong child outcomes, setting the stage for successful school experiences and graduation on-schedule with peers.

GSRP funding should be mentioned in speaking engagements and discussion with the media. In written materials, the grant name is spelled out fully at the first use of the acronym. The grant name is never modified, e.g., Great Start Preschool. The grant name, logo and acknowledgement of the funding source is included on public- and parent-facing publications or project materials developed with funds awarded under this program, including print materials and electronic information (e.g., program websites and social media). This includes print materials that are publicly distributed, intended for program recruitment, or are 'parent-facing' (e.g., application, newsletters, handbook, meeting minutes, etc.), reports/presentations, films, brochures, flyers, signs, etc. Where more than one entity's logo will be used they should be of a similar size and when possible appear on a single line. Logos are available for use and located in the [resources](#) for the Overview section of this manual. The following statement for acknowledgement of funding will be used:

- For programs with only state-funding: *These materials were developed under a grant awarded by the Michigan Department of Education.*
- For programs with braided or blended federal and state funding, such as the GSRP/Head Start Blend: *These materials were funded in whole or in part under a grant awarded by the Michigan Department of Education.*

## Child Eligibility Files

Eligibility for GSRP requires verification of a child's age and family income, as well as documentation of Program Eligibility Factors. Documentation of eligibility must be on file for every child enrolled in GSRP. This documentation must be maintained for seven (7) years.

MDE requires that ISD monitoring of subrecipients includes annual review of child files to verify child eligibility was accurately and properly determined. Child files are also subject to periodic MDE review.

## **Security of Sensitive Information**

Maintaining copies of child birth certificates or other child and family personal information, as well as financial documents viewed to verify income in child files must be considered with great care. Maintenance procedures for sensitive documents must include security measures to ensure the files and the data contained therein is protected. This includes redacting personally identifiable data on forms including social security numbers, date of birth (for all but the child enrolled), maiden names, etc. Files should be kept in a secure location under lock and key, only accessible to authorized program staff.

Applications and accompanying documents should only be discussed with those that have permission to access the information. This would include among programs to determine placement as well as any others the parent authorizes to have access.

## **Electronic Files**

Files may be electronic with scanned or photo images of eligibility documentation but must include proper security protocols to ensure safety of the data and limit file access only to authorized program staff.

## **Educational Records vs. Eligibility Records**

The educational record for each child - including home visit and parent teacher conference forms, observation data, developmental screener data, other child growth/progress documentation, and samples of child's work, etc. - is distinctly different than eligibility documentation and should be maintained in a separate file.

In cases of single, separated, or divorced families, both parents must be granted access to the child's educational information (unless court documents specify otherwise), *however*, access to personal data provided to determine eligibility (e.g. tax forms, pay stubs, etc.) should be restricted to only the parent that provided that data.

## **GSRP Policies and Procedures**

Written policies and procedures support consistent operational activities. Policies and procedures provide clarity when dealing with accountability issues or activities that are of critical importance to the grant and may have serious consequences, e.g., grievance, flow of funding, and submitting reports. Well-written procedures that are implemented and followed help to minimize misunderstandings by identifying responsibilities and establishing boundaries. All parts of the system are dependent upon one another to function properly and provide the highest level of service to children and families.

GSRP Policies and Procedures must include program and fiscal policies. ISDs have policies and procedures for grants which can be used to aid in writing GSRP fiscal and program policies. Subrecipients must be provided with a copy of GSRP Policies and Procedures. Some examples of policies and procedures that need to be written are: travel expenses allowable with amounts, steps for the bidding process, and seclusion and restraint. All GSRP policies and procedures will be reviewed during a program and/or fiscal review by MDE.

Written processes must be in the GSRP administrative files.

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## 1. Assurances

ISDs agree to comply with all applicable requirements of State statutes, Federal laws, executive orders, regulations, policies, and award conditions governing GSRP. ISDs understand and agree that if they materially fail to comply with the terms and conditions of the grant award, MDE may withhold funds otherwise due from this grant program, any other federal grant programs, or the State School Aid Act of 1979 as amended, until the ISD as fiscal agent/grantee comes into compliance, or the matter has been adjudicated, and the amount disallowed has been recaptured (forfeited). MDE may withhold up to 100 percent of any payment based on a monitoring finding, audit finding, or pending final report. All current grant assurances can be viewed in the GSRP Acceptance of Funds, the GSRP Funding Application and the GSRP Implementation Plan in MEGS+.

## 2. Child Recruitment

Refer to the [Recruitment and Enrollment](#) section of this manual for guidance on generating written procedures that align with legislative requirements about recruitment.

The ISD should work with subrecipients to create outreach and recruitment campaigns that can be funded by the 2% maximum that can be set aside and used for this work. Sharing ideas with other ISDs and adapting or adopting each other's work may make the most efficient use of the funds.

## 3. Closure Procedures

Closure procedures guide the ISD when a former subrecipient declines to participate in GSRP or in the event a subrecipient contract is terminated. A previous subrecipient that no longer chooses to implement the program must provide written notification to the ISD. Notification must include an inventory of the equipment and supplies purchased with GSRP funds that are remaining, this includes any food service equipment and supplies. The subrecipient must arrange to return all remaining equipment and materials to the ISD. The returned materials should be

distributed for use within other GSRP classrooms as needed. Excess materials can be sold to non-GSRP providers and the funds utilized by the ISD to support GSRP, after a determination is documented that use is not needed within the ISD. Materials that are well worn or aged may also be donated as appropriate.

There are infrequent instances where a program may close during the school year. Details on terminated contracts must be written in a policy and procedure by the ISD. The ISD will lead transitioning activities with the goal to prevent a break in service to children and to minimize distress to the children and families.

### **Considerations include:**

- Agreement between parties of what is a reasonable amount of time needed to finalize the closure;
- Confirmed personnel contacts before agency closure, regarding who the ISD will work with for final invoice and payment structure pieces;
- Possible proration of the funding;
- Transfer of child files;
- Transfer of subrecipient administrative files;
- Final expenditure report;
- Transfer of inventory and supplies purchased with GSRP funds; and
- All remaining reports covering the period of time for which the subrecipient participated.

## **4. Communication**

The ISD must establish and monitor systems to ensure that timely and accurate information is provided among the ISD, subrecipients, parents, policy groups and staff. Consider the following strategies:

Communication with families must be carried out on a regular basis throughout the program year, and carried out in the parent's primary or preferred language, for example:

- Newsletters
- Focus groups or surveys
- Parent-teacher conferences
- Open house events
- Local Parent Advisory Committee and School Readiness Advisory Committee meetings and minutes
- Web site
- Children's progress notes

Communication with local advisory groups and the ISD-wide school readiness advisory committee includes the following information provided on a regular basis:

- Procedures and timetables for program planning
- Policies, guidelines, and other communications from MDE
- Program and financial reports

- Program plans, policies, procedures, grant application.

Communication among staff must include mechanisms for regular communication among all program staff:

- Staff meetings
- Distribution of program quality reports
- Intranet or listserv for internal staff correspondence
- Development of subrecipient plans that includes center operations
- Updates to annual written plans
- Professional learning communities (PLCs)

## 5. Funding Application

Legislation requires an annual comprehensive needs assessment using aggregated data from the ISD service area and a community collaboration plan. The ECC must seek endorsement of the plan by the local GSC and ensure that GSRP is part of the community's Great Start strategic plan. The signed GSC Endorsement Form is retained at the ISD. The needs assessment must document:

- Annual data collection on poverty, number of four-year-old children at risk for low educational attainment and existing preschool programming;
- Discussion of data with representatives from each local education agency (LEA), child care organizations and the GSC;
- Collaborative decisions on enrollment request, program options and process to determine preschool sites for the upcoming academic year and;
- The estimated number of eligible children who will remain unserved after the ISD, LEAs and community early childhood programs have met their funded enrollments.

See the resources for this section: [GSC Endorsement Guidelines](#)

## 6. Community Partnerships

GSRP administrative policies will reflect the role of the ECC as a trusted, credible leader in the GSC, where a collective impact approach prioritizes early childhood efforts. The ECC identifies and creates connections with administrators of the licensed child care centers in the region. The ECC increases the number of and strengthens partnerships between LEAs, Head Start grantees, child care organizations, municipalities with early learning initiatives, extended-learning programs, and other community-based programs.

It is important to have shared language and understanding of the early learning years, as well as the variety of settings that children are in before transitioning into GSRP and those they will experience after transitioning out of GSRP. Use of shared language, goals, and evaluation should be included in the strategic plan for GSRP and public statements. The ECC will support clear and consistent communication about vertical alignment as a priority in both internal (e.g., district strategic plans, teacher newsletters) and external (e.g., web sites, family newsletters) platforms.

## 7. Fiscal Policy and Review

Each ISD must have written fiscal policies outlining procedures including but not limited to:

- How and when the subrecipients receive their allocations, including transportation;
- How and when the subrecipient budgets (original and carryover) and Final Expenditure Reports (FERs)/Carryover Final Expenditure Reports (COFERs) are submitted to the ISD, including supporting documentation;
- Budgeting and budget amendments;
- Completing FERs/COFERs;
- Allowability of costs;
- Inventory requirements;
- Cash management;
- Procurement;
- Closeout procedures for subrecipients (FERs, audits, and equipment). See also “3. Closure Procedures” earlier in this section;
- Professional learning/training of subrecipients on fiscal components of GRSP;
- Travel;
- Fiscal monitoring process of subrecipients;
- Food service and required spreadsheet and/or other documentation.

Subrecipient documentation must be reviewed by the ISD, depending on the agreed upon payment schedule. For example, if 100% reimbursement is used, then the ISD must require supporting documentation before a payment is made. The ISD may also choose to review subrecipients on an annual basis. The ISD must provide professional learning to both the subrecipient fiscal and program staff responsible for GRSP. Fiscal policies will be reviewed by MDE during a fiscal review. For further information on fiscal reviews, see the [Fiscal Review Process](#) document in the resources for the *Reporting and Monitoring* section of this manual.

## 8. Monitoring Subrecipients (Program)

Administrative policies must also reflect how the ISD will provide oversight and monitoring of subrecipient practices, such as local policies/procedures related to:

- Michigan Department of Licensing and Regulatory Affairs (LARA), Child Care Licensing Division, including report of violations;
- Participation in Michigan’s Great Start to Quality system;
- Parent engagement, including formal contacts;
- Use of a parent handbook that includes all required elements outlined in the [Classroom Requirements](#) section of this manual;
- The advisory structure including the advisory committee(s), and data analysis team(s);
- Human resources (staff hiring, compliance plans, supervision);
- Adult/child ratio, class size, hours and weeks of operation;



- Professional learning for teaching teams, including formal training in the curriculum and child assessment tools in use;
- Participation in the National School Nutrition Program and/or the Child and Adult Care Food Program, as applicable;
- Child enrollment;
- Child files;
- Transition plans into and out of GSRP;
- Tuition; and
- All program policies identified in the [Classroom Requirements](#) section of this manual.

## 9. Parent Advisory Committee

Legislation requires GSRP sites to provide for active and continuous participation of parents of enrolled children. Keeping in mind that those most in need of quality public education may feel less well-served by the system, the ECC will champion parents as active decision makers in GSRP, ensuring annual training that instills confidence in parents as active members. GSRP administrative files must address design and monitoring of GSRP advisory groups.

The ISD ensures that subrecipients have a local GSRP parent advisory committee with a focus on local considerations, including recruitment/enrollment, program evaluation results and child outcome data. ISDs that direct-run classrooms must also have a local parent advisory. These committees minimally meet twice each program year. Each local committee has one parent representative for every 18 children enrolled in its program, with a minimum of two parents or guardians. The local GSRP parent advisory committee also has representation from the GSRP teaching staff and support of other GSRP administration.

The local GSRP parent advisory committee designates a liaison to the GSC Parent Coalition, working with other committed parents to support early childhood practices in the community. Activities of the GSC Parent Coalition can be shared with the GSRP parent advisory committee in person, virtually (e.g., Skype) or through emailed reports.

Refer to the [Parent Involvement](#) section for more information on parent engagement.

## 10. Philosophy

The ISD will ensure that each subrecipient has a written philosophy statement and must have a process to approve each philosophy statement, determine whether the statements are promoted widely and whether the beliefs documented are used in decision-making. Discrete philosophy statements will have common features that are aligned with the [Early Childhood Standards of Quality for Pre-Kindergarten \(ECSQ-PK\)](#), yet will provide for local language to addresses social, economic, cultural, and family needs. See the [Classroom Requirements](#) section of this manual for additional information on preschool philosophy statements.

## 11. Professional Learning

Administrative policies acknowledge that effective professional learning (PL) can improve the instructional coherence among subrecipients and improve the quality of learning opportunities for young children. The planning of PL opportunities is data-driven, ongoing, and part of a long-term continuous improvement plan.

The ECC strengthens local administrative quality by arranging PL for elementary principals, directors of child care organizations, municipalities with early learning initiatives, extended-learning programs, and other community-based organizations. This group is poised for relationship-building and to learn best practices for prekindergarten.

The ECC and the ECS support meaningful PL for teaching teams. The ECS is critical to preschool quality and supports GSRP teaching teams throughout the academic year with expertise in the *ECSQ-PK*, and status as a reliable assessor/certified observer in the applicable program evaluation tool. Refer to the [Early Childhood Specialist](#) section of this manual for more information on the ECS position. The ECC will demonstrate innovative efforts to create and standardize time for school- and community-based GSRP teaching teams to work together across different daily, weekly, quarterly, and school year calendars.

ECS need time to reflect on what makes their own professional learning work strong, and what hinders it. The ECC engages and supports ECS teamwork by gathering the ECS as a community of learners more than once per year to reflect on the ECS role and responsibilities. The ECC also insures that the ECS is able to attend professional learning events, such as curriculum/child assessment training, state sponsored professional learning events and/or the HighScope International Conference.

## 12. Program Evaluation

The program evaluation plan reflects a discriminating use of data. Data markers include child-based data, classroom-based data, staff surveys and markers of family well-being.

## 13. Record-keeping

ISD administrative procedures must identify where critical grant records are housed and staff position(s) responsible to maintain files. Refer to the [Reporting and Monitoring](#) section of this manual.

Refer to the [Program Evaluation](#) section of this manual for guidance on generating written procedures that align with grant requirements about evaluation.

## 14. School Readiness Advisory Committee (SRAC)

The ECC is a leader in the ISD-wide School Readiness Advisory Committee (SRAC), established annually and which operates as a workgroup of the local GSC. One of the tasks of the SRAC is to annually review and make recommendations about:

- Collaboration with and involvement of community volunteer and/or social service organizations in addressing all aspects of educational disadvantage;
- Partnership with the local GSC, Regional Resource Center, and others to build the capacity of local community agencies to take part in GSRP;
- Collaborative recruitment and enrollment process to assure that each child is enrolled in the program most appropriate to his or her needs and to maximize the use of federal, state, and local funds;
- The choice of an approved curriculum;
- Nutritional services utilizing federal, state and local food program support as applicable;
- Health and developmental screening process;
- Referrals to community social service agencies, as appropriate;
- Parent involvement;
- Program Evaluation and Child Outcome data;
- Continuous improvement efforts; and
- Transition into kindergarten.

The SRAC will also make recommendations to the GSC regarding other community services designed to improve all children's school readiness.

## 15. Sliding Scale of Tuition

Up to 10% of children enrolled throughout the Intermediate School District (ISD) or consortium of ISDs may be from families above 250% of the Federal Poverty Level (FPL) with extreme risk for low educational achievement as determined by number or severity of GSRP program eligibility factors. These families must be charged tuition calculated on a sliding scale, based on family income and determined to be a reasonable amount a family should pay toward the cost of GSRP. The pre-calculated fee is a per-child fee, not a per-family fee.

GSRP spaces filled by over-income families are compensated at the current Part-Day or School-Day amount per child. Sliding scale fees are collected in addition to the funded amount provided per child by state school aid funds administered by the Michigan Department of Education (MDE). The [sample tuition sliding scale](#) provided in the resources for this section may be adopted or amended. Alternately, the ISD may create a sliding scale of tuition. The written policies and procedures and the fee scale with current approval by MDE need only be resubmitted if amended. Tuition income and related expenditures will not be reported to MDE, but records must be available for review upon request.

Refer to both the [Recruitment and Enrollment](#) and the [Eligibility](#) sections and the accompanying resources for each section for additional information on prioritization

for enrollment, determining family income and documenting program eligibility factors.

### **Waiver to Serve Additional Children Over the 10% Cap**

If in accordance with GSRP Prioritization requirements the ISD has enrolled 10% of children who live with families with a household income above 250% of FPL and funding remains to serve additional children, the ISD may submit a request for a waiver to serve additional children over the 10% cap. MDE provides the opportunity to submit this request during a designated period each fall.

Any ISD requesting the option to serve more than 10% of children above 250% FPL, must be able to provide documentation of due diligence to identify and enroll all children at or below 250% FPL. At a minimum, ISDs must be able to demonstrate:

1. Geographic location of GSRP classrooms compared to the population of GSRP eligible children and documentation of attempts to place classrooms in areas of high need;
2. Recruitment efforts across the ISD and targeted to areas of high need;
3. Enrollment of all identified eligible children below 250% FPL in GSRP or Head Start or documentation of reasons not enrolled; and
4. Lack of eligible children at or below 250% FPL on waiting lists for both GSRP and Head Start.

In the event that an ISD is approved to serve children up to 300% FPL, all children enrolled with income up to 300% FPL are then considered to be income eligible in terms of the 10% cap. They do however pay tuition according to the established sliding fee scale. That ISD would then be able to serve up to 10% of enrolled children with identified program eligibility factors from families having incomes above 300% FPL.

### **The following policies must be adhered to:**

1. Families whose income falls at or below 250% of FPL pay no tuition for GSRP.
2. The ISD shall establish a fee schedule for families with incomes greater than 250% of the FPL not to exceed value of the space.
3. The ISD shall implement one sliding scale of tuition for all its GSRP subrecipients.
4. Part-Day and School-Day GSRP shall charge tuition to enrolled families over 250% of the FPL and shall charge the GSRP fee only for the portion of the day supported by GSRP.
5. Tuition fees from families must be expended within the grant year that they were collected.
6. Tuition fees must be used to support the GSRP, as defined in the [Budget](#) section of this manual.
7. All Head Start and GSRP policies and regulations are applied to GSRP/Head Start Blend enrollment, with the highest standard from either program adhered to. Head Start language stipulates that a program must not charge eligible families a fee to participate in Head Start, including special events

- such as field trips, and cannot in any way condition an eligible child's enrollment or participation in the program upon the payment of a fee.
8. A program must only accept a fee from families of enrolled children for services that are in addition to services funded by Head Start, such as child care before or after funded Head Start hours. A program may not condition a Head Start child's enrollment on the ability to pay a fee for additional hours therefore, children enrolled into the GSRP/Head Start Blend must not be charged tuition.
  9. Children in foster care, those experiencing homelessness, and children with an individualized education program (IEP) recommending placement in an inclusive preschool setting are automatically eligible for GSRP and must be considered within the lowest quintile (0 – 50% Federal Poverty Level (FPL) for prioritization.
  10. A child with an IEP recommending placement in an inclusive preschool setting prioritized for enrollment within the lowest quintile, with actual family income above 250% FPL, may not be charged GSRP sliding fee scale tuition.
  11. Parents who pay tuition may not incur expenses for other portions of the program, such as meals or transportation.
  12. The number and severity of factors and local prioritization of factors contributing to educational risk must be incorporated into enrollment practices for over-income families. Documentation of the program eligibility factors must be kept in each child's file.
  13. Late payment fees are permitted only to recoup collection costs.
  14. Income and tuition fees are calculated at the time of enrollment. During the academic year, if the family situation changes, families may request a re-calculation of income to determine a lower tuition or potentially qualify as income eligible, thus eliminating remaining tuition due.

### **ISD Responsibilities:**

1. The ISD shall establish written policies and procedures for the implementation of this fee policy.
2. An approvable plan will address educational risk, fees and information for families, including invoicing, collection practices and explanations to families about the reasons for tuition fees, and how confidentiality of family information is maintained.
3. Annually updated copies of the tuition policies and procedures must be included in recruitment materials.
4. The ISD shall require subrecipients to disseminate tuition policies to enrolled families and program staff, at least in their respective parent handbooks.
5. Parents must be notified of any upcoming tuition policy-change 30 days prior to the date the change is to take place.
6. The ISD shall ensure that the fee policy is adhered to by subrecipients.
7. The ISD must adhere to all policies, above. The ISD has discretion with features such as:
  - a. Determining whether tuition payments are collected and retained at the subrecipient level or the ISD. When billing and procurement are

the responsibility of the subrecipient, how tuition income is reported to the ISD;

- b. Retention of a percentage of tuition income to cover accounting costs;
- c. Invoicing, including payment schedule, how payments are made and receipt of payment;
- d. Fee adjustment for advance payment;
- e. Fee adjustment for two or more enrolled children, absence or hardship. ISDs may assist families in need with alternate funding, scholarships, service agreements, etc.;
- f. Uses for tuition income, e.g., purchases related to program quality or child development goals, professional learning, pooled for ISD distribution as enhanced funds; and
- g. Who parents should call with questions.

The ISD sliding fee scale and guidance will be reviewed annually as part of the school readiness advisory committee which operates as a workgroup of the local Great Start Collaborative (GSC).

## **16. Distribution of Funds**

Involving the local school readiness advisory committee and the GSC in the creation of the distribution plan is advised; the GSC works with community partners and is called on annually to endorse the ISD's Funding Application, the first step in the GSRP funding process. The ISD should also partner with the GSC and the local Resource Center (RC) to build capacity for community-based organizations (CBOs) to serve as GSRP sites in future years. GSRP subrecipients must minimally have three of five stars in the Great Start to Quality (GSQ) system. Any new or potential subrecipient must have a 3 star rating to be considered for GSRP funding.

State funding is appropriated for GSRP using the state fiscal year from October 1 to September 30. Until the State Aid Act is signed by the governor each year, allocations for ISDs cannot be determined or awarded. As such, ISDs should consider the following points when making plans for contracting with subrecipients, enrolling children, or beginning programming.

- Any expenditures not utilizing carryover, thus dependent on new funding, are at risk of not being reimbursed if the GSRP appropriation is reduced.
- Communication with subrecipients and families should carefully clarify that any programming for the upcoming year is dependent on the inclusion of GSRP in the State School Aid Act.
- When working with subrecipients to determine start dates, ISDs should balance caution of risk with likelihood of continued GSRP funding levels.

Legislation requires each ISD to distribute at least 30% of its total allocation to CBOs. Each ISD reports to the department in its GSRP Program Implementation Plan (PIP) a detailed list of community-based organizations by provider type, including private for-profit, private non-profit, community college or university,

Head Start grantee or delegate, and district/PSA or ISD, the number and proportion of its total allocation awarded to each provider as a subrecipient. ISDs unable to distribute 30% of their allocation to CBOs must demonstrate to MDE the specific steps required, as detailed below, have been taken to meet the requirement.

Funds awarded to Head Start agencies, even when the Head Start agency is the ISD, contribute to the total percentage distributed to community-based partners.

Faith-Based Organizations (FBO) are considered CBOs and as such also contribute to the total percentage distributed to community-based partners. FBOs can make strong GSRP partners as they are often well-connected to community agencies that support families. Faith-based subrecipients keep prayers and religious instruction from being a part of a GSRP classroom. In space used for dual purposes, there is no need to remove or cover faith-based displays. These subrecipients do not restrict GSRP enrollment or staff hiring due to faith-based considerations.

Public School Academies (PSA) and Community Education preschools are considered LEA subrecipients. If an open-to-the-public preschool is operated by an LEA, this is also considered an LEA subrecipient. Review the LARA child care license to confirm whether an LEA or a community agency is the licensee. LEA programs are only counted as community-based providers when they are Head Start grantees or Head Start delegates.

Existing subrecipients that have met the variety of quality and administrative benchmarks required of the grant should be able to expect consistency of funding awarded. That is, the ISD may 'hold harmless' existing, strong GSRP partners and should look to additional community partners and competition between all partners when distributing increased funding.

The ISD must have a written process to distribute GSRP funding that will be fair to all current and potential early childhood partners. The document will reflect policy and procedures to follow each year, with specific consideration of allocating funds to community partners.

The policy must describe minimally one ISD notification made to licensed centers which serve preschoolers and are not current subrecipients. The ISD must work with stakeholders to determine the most effective timing and method for notification(s). The notification must include information regarding:

- The center's eligibility to participate;
- Information regarding GSRP requirements; and
- A description of the subrecipient application and selection process.

An exception to this requirement is provided for a licensed center which is not a current GSRP subrecipient and for which the ISD has documentation on file that the current licensee administration has declined partnership with GSRP.

Additionally, an approvable process addresses the following:

1. Are there current subrecipients that struggle to fill their spaces?

2. For current subrecipients, how does the ISD weight classroom quality and grant compliance in hold-harmless determinations?
3. Are there areas of high-need that require additional funding? If so, how will need for services be balanced with quality of programming?
4. Are there Focus or Priority Schools in the ISD that have qualifying children but do not have GSRP?
5. How are subrecipient decisions regarding program options and services addressed? (For example, Part-day vs. School-day, transportation, etc.)
6. Are there administrative issues that would prohibit a program from being funded? (For example, licensing, fiscal capacity, pattern of late or incomplete reporting, etc.)
7. Are there specific local issues that will impact the distribution of funding or that could be addressed through the distribution plan?
8. How does the ISD partner with the local GSC, Resource Center, and others to build the capacity of local community agencies to take part in GSRP in future years?

Planning for the subsequent grant and academic year considering that the ISD will receive contact information for each licensed childcare center located in the service area of the intermediate district or consortium by March 1 of each year:

1. What is the timeline for subrecipient selection and notification of funding?
2. In what ways and at what time will the ISD reach out to notify each licensed center that serves preschoolers located in the service area of the intermediate district or consortium that is not a current subrecipient to make them aware of the opportunity to become a part of GSRP?
3. In these notices, how will the ISD provide information regarding GSRP requirements and a description of the subrecipient application and selection process for community-based providers?
4. How does the ISD give the potential partners contact information for someone who could answer questions during the subrecipient selection and distribution process?
5. What programs in the community are prepared either to increase the number of children served or to begin a GSRP?
6. What is the process for the competitive request for proposals?
  - a. What factors will be considered in selecting subrecipients?
  - b. How will fairness across all eligible entities (LEAs/CBOs) be assured?
  - c. How and when will the ISD share the requirements the potential partner would have to meet to apply and those that would have to be met if chosen? An example would be staff credentialing requirements. Applicants would not have to have compliant staff to apply. They would however have to agree that, if chosen to receive funding, appropriate staff would be hired.
  - d. What is the timeline and process for the ISD to collect pertinent information from potential partners?
  - e. What is the objective review process to rate/rank proposals?



- f. What stakeholders make up the team that reviews proposals and makes funding distribution decisions?
  - g. How and when does the ISD inform potential community partners of the factors the ISD will consider in making its decisions to award funding?
  - h. How and when does the ISD communicate to those being awarded funding?
  - i. What is the timeline and process for how the ISD will communicate with those applicants not being awarded funding for the grant year and give feedback as to why the decision was made?
7. What process will an entity not awarded funding, or an entity awarded a reduced level of funding have, to appeal the decision locally and how will they be informed of that process? The essential question for an appeal should be whether the ISD provided the process to award funding in writing and followed its process with fidelity.
  8. How will the ISD provide to the public and to participating families a list of community-based GSRP subrecipients with a GSQ rating of at least 3 stars?

## **17. Written Agreements**

A written agreement is required between the ISD and its subrecipients. The agreement must contain the components that form a binding agreement between two or more parties, including an offer, acceptance of that offer and consideration of what each party gives of value that each would not normally be legally obligated to provide.

### **Agreement for Services**

1. Each document must clearly state that it is a contract/agreement between the ISD and each subrecipient to meet the need for GSRP services.
2. Agreements must address impasse or default for parties that do not complete any portion of the agreement and identify the entity providing the dispute arbiter.
3. The contract will reflect GSRP requirements including:
  - a. a plan for how the ISD and subrecipients will partner to ensure high-quality implementation of the GSRP (e.g., monitoring, auditing, orientation, mentoring, and hiring and professional learning of staff);
  - b. a list of the developmental screening tool, curriculum, child assessment tool used, and how staff will receive training on the full implementation of each of the tools;
  - c. a plan showing partnership in conducting annual program evaluation using the applicable program evaluation tool, with expectations that each program develops annual plans toward earning a high-quality score (as defined for the applicable tool);

- d. an explanation of how the subrecipient will be involved in area-wide and local advisory groups, how often the local group will meet each year and how the subrecipient will ensure parent participation at the local level.
4. The contract will include a general timeline for required GSRP reports and who will be responsible for completion of each report.
5. The contract will describe the ISD's system to seek information from the subrecipient about, provide oversight on, and evaluate the effectiveness of each of the itemized features in the local contracts.
6. The contract will ensure that administrative funds are not exceeded. It must include a statement regarding the administrative cap for the ISD.
7. It must also specify whether the ISD will keep the 2 percent for a shared outreach and recruitment campaign or allow the funds to be split with subrecipients. If split, the ISD must provide guidance on how the funds may be used.
8. The contract must report the process for flow of funding; e.g., state the process for the ISD to make monthly payments or reimbursements to the subrecipients and how the ISD will track both revenue and expenses.
9. The contract must state which financial records the subrecipient is required to submit to the ISD and which it must retain for monitoring purposes. The ISD will also affirm its responsibility to maintain financial records necessary for MDE audit.
10. The program option(s) to be implemented must be included: Part-Day, School-Day or GSRP/Head Start Blend.
11. The number of spaces to be filled must be included. Any modification to this number must be noted in an addendum.
12. If the ISD is retaining additional funds to support program quality, a strong contract will identify services.
13. The contract must be signed and dated by both parties. Complete titles, including agency name, must accompany each signature.
14. Contracts between the ISD and subrecipients that are continuing from previous years must be in place by October 1, the start of the grant year.
15. Contracts with new subrecipients must meet this deadline if the program starts at the beginning of the grant year.

## Other Contracts

A written agreement is also required between the ISD and any other party responsible for any GSRP service. The agreement must contain the components that form a binding agreement between two or more parties including; scope of services, defined compensation, a defined period and signatures with titles of all parties involved.

**Portions of this section were adapted from:**

HHS/ACF/ACYF/HSB (2006). [\*Tips for Establishing an Effective Communication System.\*](#)

Kauerz, K. & Coffman, J. (2013). [\*Framework for Planning, Implementing, and Evaluating PreK-3rd Grade Approaches.\*](#) Seattle, WA: College of Education, University of Washington.

Language Diversity and Literacy Development Research Group. [\*Lead for Literacy Initiative Memos.\*](#)